UNITED STATES DISTRI SOUTHERN DISTRICT O	F NEW YORK	_
ELIZABETH BURBAGE,		- x :
- against -	Plaintiff,	Case No. CV 07 37665 and Twenty-Seven Related Actions
LOUIS PUBLIC COMPAN VOYAGERS, INC.,	Defendants.	: (WCC)(GAY) : :
NORMA BALDUCCI,		: X :
	Plaintiff,	: Case No. 07 Civ. 3668 (WCC)
-against-		:
LOUIS PUBLIC COMPAN VOYAGERS, INC.,	IY LIMITED and GROUP	; ; ;
	Defendants.	:
LORRAINE CARPINO,		: :
	Plaintiff,	: Case No. 07 Civ. 6977 (WCC)
-against-	•	:
LOUIS PUBLIC COMPAN VOYAGERS, INC.,	IY LIMITED and GROUP	; ; ;
	Defendants.	<u>:</u>
PATRICIA DeASTIS		: :
-against-	Plaintiff,	: Case No. 07 Civ. 3681 (WCC)
LOUIS PUBLIC COMPAN VOYAGERS, INC.,	NY LIMITED and GROUP	· : :
	Defendants.	: X

PAUL S. EDELMAN, being duly sworn, deposes and says:

I am counsel to the firm of Kreindler & Kreindler LLP and am fully acquainted with the facts and circumstances of this case. My firm has substituted for the firm of Todd J. Krouner and has filed Consents to Change Attorneys in the cases of Norma Balducci, Lorraine Carpino,

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Patricia DeAstis, Ann Horrigan, Laurel Kossow and Lucy Vitaliano. We are awaiting signed consents from Lauren, Sarah and W. Henry Alderfer, but they are abroad and receipt of signed consents has been delayed. We now also represent 22 other clients of Mr. Krouner's, 17 of our own and 24 from Calgary, Canada. Of Mr. Krouner's cases only these 31 remain; the others have been settled.

Attached to this affidavit are the following relevant documents which will be referred to in the accompanying Memorandum of Law.

- 1. The ticket of Defendant Louis Cruises received from Defendant Group Voyagers.
- 2. EC Law, 90/314/EEC (EC Package Travel Regulations).
- 3. The (so-called) Garrido cases decided under the above regulations;

"Club Tour v. Garrido", (Porto, Portugal) which explains the reach of the directive, and discuses strict liability against a tour operator/organizer.

- 4. EU Summary of Council Directive 90/314/EEC on package travel.
- 5. Affirmation of Alexander Anolik concerning the EC Directive.

Dated: February 26, 2008

Paul S. Edelman

Sworn to before me this day of February 2008

Notary Public

EUGENIE L. MASTERSON Notary Public, State of New York No. 30-4719641 Qualified in Nassau County Term Expires October 31, 2010